

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Nitetek Licensing LLC,

Plaintiff,

v.

Vertiv Co.,

Defendant.

Case No. 4:20-cv-04036

Patent Case

Jury Trial Demanded

**AGREED MOTION FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO THE COMPLAINT**

Plaintiff, Nitetek Licensing LLC (“Plaintiff”) and Defendant, Vertiv Co. (“Defendant”), hereby submit an Agreed Motion for Extension of Time to Respond to the Complaint, through and including April 14, 2021. In support thereof, the parties state as follows:

1. On November 25, 2020, Plaintiff filed its Complaint in this action.
2. On March 10, 2021, Plaintiff served the Complaint on Defendant.
3. Defendant’s responsive pleading deadline is currently March 31, 2021.
4. Defendant has recently retained lead counsel, however lead counsel has not yet been admitted to this Court in this case. Defendant’s lead counsel is diligently working on engaging local counsel to assist it in this action.
5. Defendant respectfully requests this 14-day extension so that it may retain local counsel and so that lead counsel can familiarize themselves with the matter and the patents-in-suit and prepare a responsive pleading.

6. Plaintiff is not opposed to Defendant having an extension of time up to, and including, April 14, 2021, to respond to the Complaint.

7. The parties do not believe that this brief extension will materially impact or delay the proceedings in the case.

8. This is Defendant's first request for an extension, and this motion is not brought for the purposes of unduly delaying the proceedings or to prejudice Plaintiff.

WHEREFORE, Plaintiff and Defendant respectfully request that the Court grant this motion, and allow Defendant up to, and including, April 14, 2021, to answer or otherwise respond to Plaintiff's Complaint.

Dated: March 24, 2021

Respectfully submitted,

/s/ Isaac Rabicoff
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on March 24, 2021, via the Court's CM/ECF system.

/s/
Isaac Rabicoff